UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

L.G. PHILIPS LCD., CO. LTD Plaintiff)	
v.)	Civil Action No. 04-11076 (RCL)
MICHELE B. BOVIO, and)	
ROBERT C. FRAME)	
Defendant)	
)	

MOTION OF DEFENDANT ROBERT C. FRAME
FOR ADMISSION PRO HAC VICE OF
TERESA M. CORBIN, ESQ., GLENN W. RHODES, ESQ.,
CHRISTOPHER A. MATHEWS, ESQ., BRIAN S. KIM, ESQ.,
MICHAEL L. RESCH, ESQ. AND HEATHER H. FAN, ESQ.
PURSUANT TO LOCAL RULE 83.5.3

Pursuant to Local Rule 83.5.3 of the United States District Court for the District of Massachusetts defendant, Robert C. Frame ("defendant") respectfully moves this Court for an Order granting Teresa M. Corbin, Esq., Glenn W. Rhodes, Esq., Christopher A. Mathews, Esq., Brian S. Kim Esq., Michael L. Resch Esq. and Heather H. Fan Esq. leave to appear in the above action as co-counsel for the defendant. In support of this motion, Robert C. Frame states:

- 1. This Motion for Admission *Pro Hac Vice* is made for good cause in that Teresa M. Corbin, Glenn W. Rhodes, Christopher A. Mathews, Brian S. Kim, Michael L. Resch and Heather H. Fan have served as counsel for the defendant in this and other matters. The above-listed counsel have become acquainted with the defendant and the issues involved in this litigation.
- 2. As a result of their attorney-client relationship with Robert C. Frame, Mr. Frame desires to have Attorneys Teresa M. Corbin, Glenn W. Rhodes, Christopher A. Mathews, Brian S. Kim, Michael L. Resch and Heather H. Fan represent him in the United States District Court for the District of Massachusetts in the above-captioned matter.

- 3. Teresa M. Corbin is a partner with the law firm of Howrey Simon Arnold & White, LLP, 525 Market Street, San Francisco, CA 94105. A large percentage of Attorney Corbin's practice is in the area of intellectual property law. See Affidavit of Teresa M. Corbin, Esq. in Support of Motion of Defendant Robert C. Frame For Admission Pro Hac Vice, attached hereto as Exhibit A.
- 4. Glenn W. Rhodes is a partner with the law firm of Howrey Simon Arnold & White, LLP, 525 Market Street, San Francisco, CA 94105. A large percentage of Attorney Rhodes' practice is in the area of intellectual property litigation.

 See Affidavit of Glenn W. Rhodes, Esq. in Support of Motion of Defendant Robert C. Frame For Admission Pro Hac Vice, attached hereto as Exhibit B.
- 5. Christopher A. Mathews is a partner with the law firm of Howrey Simon Arnold & White, LLP, 550 South Hope Street, Suite 1100 Los Angeles, CA 90071. A large percentage of Attorney Mathews' practice is in the area of intellectual property law, including patent litigation. See Affidavit of Christopher A. Mathews, Esq. in Support of Motion of Defendant Robert C. Frame For Admission Pro Hac Vice, attached hereto as Exhibit C.
- 6. Brian S. Kim is a partner with the law firm of Howrey Simon Arnold & White, LLP, 550 South Hope Street, Suite 1100 Los Angeles, CA 90071. A large percentage of Attorney Kim's practice is in the area of patent and general commercial litigation, with a focus on electrical and computer science matters.

 See Affidavit of Brian S. Kim, Esq. in Support of Motion of Defendant Robert C. Frame For Admission Pro Hac Vice, attached hereto as Exhibit D.
- 7. Michael L. Resch is an associate with the law firm of Howrey Simon Arnold & White, LLP 550 South Hope Street, Suite 1100 Los Angeles, CA 90071. A large percentage of Attorney Resch's practice is in the area of complex civil litigation. See Affidavit of Michael L. Resch, Esq. in Support of Motion of Defendant Robert C. Frame For Admission Pro Hac Vice, attached hereto as Exhibit E.
- 8. Heather H. Fan is an associate with the law firm of Howrey Simon Arnold & White, LLP 550 South Hope Street, Suite 1100 Los Angeles, CA 90071. A large percentage of Attorney Fan's practice is in the area of patent litigation.

 See Affidavit of Heather H. Fan, Esq. in Support of Motion of Defendant Robert C. Frame For Admission Pro Hac Vice, attached hereto as Exhibit F.

- 9. The undersigned counsel will be associated with Teresa M. Corbin, Glenn W. Rhodes, Christopher A. Mathews, Brian S. Kim, Michael L. Resch and Heather H. Fan in the handling of the above captioned proceeding on behalf of the defendant.
- 10. Teresa M. Corbin is a member of the bar in good standing in every jurisdiction where she has been admitted to practice. There are no disciplinary proceedings pending against her as a member of the bar in any jurisdiction.

 See Exhibit A.
- 11. Glenn W. Rhodes is a member of the bar in good standing in every jurisdiction where he has been admitted to practice. There are no disciplinary proceedings pending against him as a member of the bar in any jurisdiction. See Exhibit B.
- 12. Christopher A. Mathews is a member of the bar in good standing in every jurisdiction where he has been admitted to practice. There are no disciplinary proceedings pending against him as a member of the bar in any jurisdiction. See Exhibit C.
- 13. Brian S. Kim is a member of the bar in good standing in every jurisdiction where he has been admitted to practice. There are no disciplinary proceedings pending against him as a member of the bar in any jurisdiction. See Exhibit D.
- 14. Michael L. Resch is a member of the bar in good standing in every jurisdiction where he has been admitted to practice. There are no disciplinary proceedings pending against him as a member of the bar in any jurisdiction. See Exhibit E.
- 15. Heather S. Kim is a member of the bar in good standing in every jurisdiction where she has been admitted to practice. There are no disciplinary proceedings pending against her as a member of the bar in any jurisdiction.

 See Exhibit F.
- 16. Teresa M. Corbin, Glenn W. Rhodes, Christopher A. Mathews, Brian S. Kim, Michael L. Resch and Heather H. Fan are familiar with the Local Rules of the United States District Court for the District of Massachusetts, and will confer with the undersigned counsel during the course of this litigation concerning the Local Rules.

The Defendant, Robert C. Frame, By his Attorneys,

Edward D. Shoulkin
B.B.O. No. 555483
Andria Coletta
B.B.O. No. 636930
Taylor, Duane, Barton & Gilman, LLP
111 Devonshire Street
Boston, MA 02109

Page 4 of 4

Certificate of Conference

I Andria Coletta, hereby certify that counsel for all parties were contacted prior to filing the above motion in accordance with Local Rule 7.1

Andria Coletta

CERTIFICATE OF SERVICE

I Andria Coletta, attorney for the defendant hereby certify that on August 20, 2004, I served a copy of the foregoing Motion Of Defendant Robert C. Frame For Admission Pro Hac Vice of Teresa M. Corbin, Esq., Glenn W. Rhodes, Esq., Christopher A. Mathews, Esq., Brian S. Kim, Esq., Michael L. Resch, Esq. And Heather H. Fan, Esq. Pursuant to Local Rule 83.5.3 by mailing same postage pre-paid to all counsel of record.

Andria Coletta